

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:24-cv-00097

NEW HANOVER COUNTY,

Plaintiff(s),

v.

THE CHEMOURS COMPANY; THE CHEMOURS
COMPANY FC, LLC, et al.

Defendant(s).

**SUPPLEMENTAL REMOVAL COVER
SHEET**

The removing party must complete this Supplemental Removal Cover Sheet and comply with Local Civil Rule 5.3. Attach separate sheets as necessary to provide complete responses.

Section A—Plaintiffs

List the full name of each plaintiff from the state court action and indicate whether the plaintiff is pending (i.e., in case currently), dismissed, or otherwise terminated at the time of removal. If dismissed or terminated, indicate the date of dismissal/termination

Full Name of Plaintiff	Pending at time of removal – Yes/No?	Dismissed or terminated? Yes/No?	Date of Dismissal or Termination
NEW HANOVER COUNTY	Yes	No	

Section B—Defendants

List the full name of each defendant from the state court action and indicate whether the defendant is pending, dismissed or otherwise terminated at the time of removal. If dismissed or terminated, indicate the date of dismissal/termination. If known, indicate if and when each defendant was served with process and whether the defendant joins in the removal.

Full Name of Defendant	Pending at time of removal? Yes/No?	Dismissed or terminated? Yes/No? (If yes, state date of termination)	Has defendant been served with process? Yes/No/Unknown?	If served with process, date of service?	Does the defendant join in removal? Yes/No?
Please see Attachment A.					

Section C—Removal pursuant to 28 U.S.C. § 1442(d)(1)

Is only part of the state court action being removed pursuant to 28 U.S.C. § 1442(d)(1)?

Yes ☐ No ☒

If “Yes,” specify what portion of the state court action is being removed, and then proceed to the signature page. If “No,” proceed to Section D.

Section D—Pending State Court Motions as of Date of Removal

Is there currently a temporary restraining order or preliminary injunction in place in this action from state court? Yes ☐ No ☒

List every known motion pending at the time of removal. Indicate the name of the filer, the date of filing, whether the motion has a supporting memorandum, and whether the motion is time sensitive, such as a motion for preliminary injunction.

Title of Pending Motion	Name of Filer	Date of Filing	Memorandum-- Yes/No?	Time sensitive? Yes/No?
None				

Section E—Scheduled State Court Hearings as of Date of Removal

Date and Time of Hearing	Hearing Type	Assigned State Court Judge
None		

Date: 2/19/2024

/s/ Christopher J. Blake

Signature of Attorney for Removing Party or
Unrepresented Removing Party

Printed Name Christopher J. Blake

Law Firm Nelson Mullins Riley & Scarborough LLP

Address 301 Hillsborough Street, Suite 1400

Raleigh, NC 27603

Telephone Number (919) 329-3800

Fax Number (919) 329-3799

Email Address: chris.blake@nelsonmullins.com

State Bar No. 16433

ATTACHMENT A					
Full Name of Defendant	Pending at time of removal? Yes/No?	Dismissed or terminated? Yes/No?	Has defendant been served with process? Yes/No/Unknown?	If served with process, date of service?	Does the defendant join in removal? Yes/No
The Chemours Company	Yes	No	Unknown		No
The Chemours Company FC, LLC	Yes	No	Unknown		No
E. I. Du Pont de Nemours and Company	Yes	No	Unknown		No
DuPont de Nemours, Inc.	Yes	No	Unknown		No
Corteva, Inc.	Yes	No	Unknown		No
3M Company (f/k/a Minnesota Mining and Manufacturing Co.)	Yes	No	Unknown		No
AGC Chemical Americas, Inc.	Yes	No	Unknown		No
AGC Inc. f/k/a Asahi Glass Co.	Yes	No	Unknown		No
Archroma Management LLC	Yes	No	Unknown		No
Archroma U.S., Inc.	Yes	No	Unknown		No
Arkema, Inc.	Yes	No	Unknown		No
BASF Corporation	Yes	No	Unknown		No
Buckeye Fire Equipment Company	Yes	No	Unknown		No
Carrier Global Corporation	Yes	No	Unknown		No
Chemdesign Products, Inc.	Yes	No	Unknown		No
Chemguard, Inc.	Yes	No	No		N/A
Chemicals Incorporated	Yes	No	Unknown		No
Chubb Fire, Ltd.	Yes	No	Unknown		No
Clariant Corporation	Yes	No	Unknown		No
Deepwater Chemicals, Inc.	Yes	No	Unknown		No

Doe Defendants, John 1-49	Yes	No	Unknown		No
Dynax Corporation	Yes	No	Unknown		No
Kidde PLC, Inc.	Yes	No	Unknown		No
Nation Ford Chemical Company	Yes	No	Unknown		No
National Foam, Inc.	Yes	No	Unknown		No
Raytheon Technologies Corporation (f/k/a United Technologies Corporation)	Yes	No	Unknown		No
Tyco Fire Products LP	Yes	No	Yes	1/19/2024	N/A
UTC Fire & Security Americas Corporation, Inc.	Yes	No	Unknown		No